

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

**JOHN DOE,**

**Plaintiff,**

**v.**

**KASH PATEL**, Director of the Federal  
Bureau of Investigation, in his official  
capacity,

**Defendant.**

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**Civil Action No. 1:24-cv-02365-MSN-IDD**

**PROTECTIVE ORDER**

This matter is before the Court pursuant to the Court's Order of March 28, 2025, directing the parties to submit a consent motion with a proposed protective order permitting the Plaintiff to redact information specifically related to the expunged records in this matter. The parties to this action have filed the consent motion and agreed to the proposed redactions and the terms of this Protective Order. Therefore, having considered the matter and deeming it otherwise proper and just to do so, it is ORDERED, and pursuant to Fed. R. Civ. P. 26(c)(1), the Consent Motion is GRANTED on the following terms:

1. The Clerk is directed to replace the following docket entries with the corresponding redacted documents that are attached to the Consent Motion for Protective Order as Ex. 2, so that the redacted information *only* shall not be made available to the public:
  - a. Complaint (Doc. 1);

- b. Plaintiff's Memorandum in Support of His Motion to Proceed in Pseudonym (Doc. 6);
  - c. Plaintiff's Unopposed Objection to the Magistrate Judge's Order Denying Plaintiff's Motion to Proceed in Pseudonym (Doc. 11);
  - d. Defendant's Memorandum in Support of Motion to Dismiss (Doc. 17).
- 2. Within three days after the Clerk files all of the redacted documents and pleadings in place of the currently-filed documents and pleadings, the Plaintiff shall file a notice with the Court containing the Plaintiff's name;
  - 3. The Parties shall take all necessary actions protect from public disclosure the state, descriptions and titles of the original trial and appellate courts; the description, titles, or statutory citations of the expunged charges, indictment, conviction, appeals, and expunction order associated with the Plaintiff and the subject matter of this case.
  - 4. The Parties are ORDERED to redact all such identifying information described in paragraph 3 herein before a document, pleading, exhibit, or other paper is filed with the Clerk of the Court or supplied to any non-party in this action;
  - 5. If redaction is not possible in the public filing of pleadings, documents, exhibits, or other papers, the Parties shall move for leave to file such documents under seal in strict compliance with Local Rule 5;
  - 6. The Parties shall admonish party and non-party witnesses that they are obliged to protect from public disclosure the descriptions and titles of the original trial and appellate courts, the description, titles, or statutory citations of the expunged

charges, indictment, conviction, appeals, and expunction, associated with the Plaintiff and the subject matter of this case.

7. The obligations imposed by this protective order survive the termination of this action.
8. This Order may only be modified by the Court on its own initiative or on motion of a party or any other person with standing concerning the subject matter.

It is SO ORDERED this 11th day of April 2025.

/s/

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Ivan D. Davis  
United States Magistrate Judge

Alexandria, Virginia